

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

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CARL SHUPE and MATTHEW PEARLMAN,	:	
Individually and on Behalf of All Others	:	
Similarly Situated,	:	No. 21-cv-11528
Plaintiffs,	:	
	:	Honorable Thomas L. Ludington
v.	:	District Judge
	:	
ROCKET COMPANIES, INC., JAY D.	:	Honorable Anthony P. Patti
FARNER, DANIEL GILBERT and ROCK	:	Magistrate Judge
HOLDINGS INC.,	:	
Defendants.	:	
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JOINT STATUS REPORT

Plaintiffs Carl Shupe and Matthew Pearlman (“Plaintiffs”) and Defendants Rocket Companies, Inc., Rock Holdings Inc., Jay D. Farner, and Daniel Gilbert (collectively, “Defendants,” and together with Plaintiffs, the “Parties”) submit this joint status report in accordance with the Court’s order dated November 20, 2023.

As of the date of this filing, the Parties have (1) substantially completed document discovery, with Defendants producing a total of 33,952 documents, covering 234,071 pages; (2) completed depositions of all four expert witnesses proffered by the Parties in conjunction with Plaintiffs’ August 30, 2023 Motion for Class Certification (ECF No. 74) (*i.e.*, Mr. Chad Coffman, Dr. René Stulz, Dr. Mark Garmaise, and Dr. Laura Starks); (3) completed the deposition of Plaintiff Shupe in

conjunction with Plaintiffs’ August 30, 2023 Motion for Class Certification, with the deposition of Construction Laborers Pension Trust for Southern California (“SoCal”) scheduled for February 1, 2024; and (4) completed depositions of two fact witnesses and the corporate representative of Defendant Rocket Companies, Inc., with six more fact witness depositions scheduled through February 15, 2024.

The current deadline for fact discovery is January 26, 2024. However, for the convenience of witnesses and the Parties, and in consideration of deadlines in the related litigations, the Parties have agreed to extend the deadline for completion of fact witness depositions until February 15, 2024. The Parties have thus stipulated, pending approval of the Court, to extend the remainder of the discovery schedule to the following:

Event	Scheduling Order Deadline (ECF No. 75)	New Stipulated Date
Fact Discovery Cutoff	January 26, 2024	February 15, 2024
Submission of Opening Expert Reports for Expert Witnesses to be Called in Party’s Case-in-Chief	February 9, 2024	March 29, 2024
Expert Rebuttal Reports	March 15, 2024	April 29, 2024
Expert Depositions	April 15, 2024	June 21, 2024

Finally, the Parties have scheduled a private mediation to take place in New York City on March 27, 2024 with David M. Murphy of Phillips ADR

Enterprises. The Parties agree to report back to the Court on the results of the private mediation within two weeks following the conclusion of the private mediation.

Respectfully submitted,

DATED: January 22, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record, and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: None.

Respectfully submitted,

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January 22, 2024